EXHIBIT A



Benjamin W. Hulse Direct Dial: 612-343-3256 E-Mail: bhulse@blackwellburke.com

August 14, 2017

VIA EMAIL AND U.S. MAIL

Travis R. Walker The Law offices of Travis R. Walker, P.A. 1235 SE Indian Street, Suite 101 Stuart, Florida 34997 traviswalker@traviswalkerlaw.com

Re: In re Bair Hugger Forced Air Warming Devices Products Liability Litigation

MDL No. 2666 – Deficiencies in Amended Plaintiff Fact Sheet Charles v. 3M Company et al. Case No.: 0:17-cv-00286-JNE-FLN

Dear Counsel:

We are in receipt of the amended Plaintiff Fact Sheet (PFS) for the above-captioned matter. The PFS still has core deficiencies, as set forth in the enclosed report.

Paragraph 4 of Pretrial Order No. 14 defines core deficiencies as "a lack of response to all questions in Section I, Section II, and Section III; Section IV, questions 1, 3, 7, 8, 9, 10; Section V, questions 5, 6, and 7; Section VI, questions 1, 3, 6, 7, 8, and 9; Section VII, questions 1 and 2; Section 8, question 2; Section IX, questions 1, 3, and 4, or lack of signed medical authorizations." Paragraph 3 further requires a signed verification.

In addition, the instructions on the PFS form prohibit leaving spaces blank and provide as follows: "If a question is not applicable to you, please state 'Not Applicable' or 'N/A." In our review, many deficiencies resulted from a plaintiff leaving one or more spaces blank.

Pursuant to paragraph 6 of PTO 14, within 3 weeks of the date of this letter, you must respond in writing by either (1) curing the deficiencies (by serving a further revised, verified PFS through Plaintiffs' portal); (2) disputing the deficiencies and setting forth the reasons the PFS is not deficient; or (3) explaining why the deficiencies cannot be timely cured. When serving a revised, verified PFS through Plaintiff's portal, you do not need to resubmit documents that were previously served with the original PFS.

Sincerely,

s/Benjamin W. Hulse

Benjamin W. Hulse

ce: Plaintiffs' Co-Lead Counsel Enclosure

Title "Charles_Kimberly_15-2666JNEFLN_1_Charles_Kimberly-15-cv-2666JNEFLN_1"

Charles_Kimberly_15-2666JNEFLN_1_Charl es_Kimberly-15-cv-2666JNEFLN_1

PLAINTIFFS' LAST NAME - Charles PLAINTIFFS' FIRST NAME - Kimberly CASE NO. - 15-2666(JNE/FLN) SECTION I (CASE INFORMATION) -SECTION II (PERSONAL INFORMATION) - Incomplete SECTION II - INCOMPLETE QUESTIONS - 08 SECTION III (SURGERY INFORMATION) - Incomplete SECTION III - INCOMPLETE QUESTIONS - 03 SECTION IV - 1 (VITAL STATISTICS) -SECTION IV - 10 (DRUG/ALCOHOL) -SECTION IV - 3 (HÈALTHCARE PROVIDERS) -SECTION IV - 7 (PHARMACIES/DRUGSTORES) -SECTION IV - 8 (DENTAL PROCEDURES) - Incomplete SECTION IV - 9 (TOBACCO) -SECTION IX - 1 (CONSORTIUM NAME ETC.) -SECTION IX - 3 (RESIDENCES) -SECTION IX - 4 (MARRIED) -SECTION V - 5 (DISABILITY CLAIMS) -SECTION V - 6 (LAWSUITS) -SECTION V - 7 (BANKRUPTCY) -SECTION VI - 1 (PHYSICAL INJURY) -SECTION VI - 3 (EMOTIONAL DISTRESS) -SECTION VI - 6 (WARNINGS) -SECTION VI - 7 (3M/ARIZANT COMMUNICATIONS) -SECTION VI - 8 (3M/ARIZANT WARRANTY) -SECTION VI - 9 (AUGUSTINE) -SECTION VII - 1 (LOST PAST WAGES) - Incomplete SECTION VII - 2 (LOST FUTURE WAGES) -SECTION VIII - 2 (VERBAL/WRITTEN STATEMENT) -X.01 - SIGNED AUTHORIZATION -X.02.D - DOCUMENTS - SIGNED VERIFICATION -1.03.B - PLAINTIFFS' COUNSEL'S FIRM - Travis R. Walker

I.03.E - PLAINTIFFS' COUNSEL'S EMAIL - traviswalker@traviswalkerlaw.com

EXHIBIT B

From: Ben Hulse

Sent: Friday, October 13, 2017 4:45 PM

To: 'JoanEricksen_Chambers@mnd.uscourts.gov' <JoanEricksen_Chambers@mnd.uscourts.gov>;

'Noel Chambers@mnd.uscourts.gov' <Noel Chambers@mnd.uscourts.gov>

Cc: Jerry Blackwell <blackwell@blackwellburke.com>; Bridget Ahmann

<Bridget.Ahmann@FaegreBD.com>; 'gzimmerman@meshbesher.com'

<gzimmerman@meshbesher.com>; 'bgordon@levinlaw.com' <bgordon@levinlaw.com>;

'MVC@ciresiconlin.com' <MVC@ciresiconlin.com>; 'JMC@CiresiConlin.com' <JMC@CiresiConlin.com>;

David J. Szerlag <david@pritzkerlaw.com>; Wendy Thayer <wendy@pritzkerlaw.com>

Subject: Bair Hugger, MDL 2666 -- Defendants' lists of PFS disputes for October 2017

Dear Judge Ericksen,

Even though this month's status conference has been cancelled, Defendants would still like to list cases with Plaintiff Fact Sheet disputes, as provided by PTO 14, paragraph 7, Dkt. No. 117.

When the Court cancelled the March 2017 status conference, it issued an order stating that the PFS disputes on the lists submitted by Defendants were "deemed 'addressed to the Court' notwithstanding the fact that there will be no in-court conference this month." Dkt. No. 270. Defendants respectfully request that the Court do the same this month, and deem the disputes on these lists "addressed to the Court."

Best regards,
Ben Hulse
Counsel for Defendants

Benjamin W. Hulse Blackwell Burke P.A. 431 South Seventh Street, Suite 2500 Minneapolis, MN 55415 Direct (612) 343-3256 Fax (612) 343-3205

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CASE 0:15-md-02666-JNE-DTS Doc. 1021-1 Filed 12/07/17 Page 6 of 15

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets (As of October 13, 2017)

Case Number	Title	Date Filed	Due Date	Comments	Prior Listing	Firm Name
0:17-cv-01441-JNE-FLN	Morgan v. 3M Company et al	5/1/2017	7/30/2017		9/07/2017	
0:17-cv-01640-JNE-FLN	Cardwell-Lily v. 3M Company et al.	5/18/2017	8/16/2017		8/10/2017 9/07/2017	Bernstein Liebhard LLP
0:17-cv-01784-JNE-FLN	Fitts v. 3M Company et al	5/26/2017	8/24/2017		8/10/2017 9/07/2017	Kirtland & Packard LLP
0:17-cv-01886-JNE-FLN	Paris v. 3M Company et al	6/2/2017	8/31/2017		8/10/2017 9/07/2017	Kirtland & Packard LLP
0:17-cv-03008-JNE-FLN	Toland v. 3M Company et al	7/17/2017	8/8/2017 8/14/2017; 9/13/2017	Defendants granted Plaintiff's counsel two extensions.		Brown and Crouppen, P.C
0:17-cv-02182-JNE-FLN	Bond v. 3M Company et al	6/22/2017	9/20/2017			Brown and Crouppen, P.C
0:17-cv-02183-JNE-FLN	Gaver v. 3M Company et al	6/22/2017	9/20/2017			Brown and Crouppen, P.C
0:17-cv-02395-JNE-FLN	Hecht, Theodore v. 3M Company et al	6/29/2017	9/27/2017			Kirtland & Packard LLP
0:17-cv-02394-JNE-FLN	Mucci v. 3M Company et al	6/29/2017	9/27/2017			Kirtland & Packard LLP
0:17-cv-02434-JNE-FLN	Engel v. 3M Company et al	6/30/2017	9/28/2017			Kennedy Hodges, L.L.P.
0:17-cv-02453-JNE-FLN	Hughes, et al v. 3M Company	7/3/2017	10/1/2017			The Miller Firm, LLC
0:17-cv-02503-JNE-FLN	Wagner v. 3M Company et al	7/5/2017	10/3/2017			Kennedy Hodges, L.L.P.

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

CASE 0:15-md-02666-JNE-DTS Doc. 1021-1 Filed 12/07/17 Page 7 of 15

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices (As of October 13, 2017)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:16-cv-04381-JNE-FLN	Manzanares v. 3M Company et al	8/8/2017	8/24/2017		Bernstein Liebhard LLP
0:17-cv-02090-JNE-FLN	Robertson v. 3M Company et al	8/30/2017	9/20/2017		The Law offices of Travis R. Walker, P.A
0:17-cv-00887-JNE-FLN	Morris et al v. 3M Company et al	9/8/2017	9/29/2017		McGlynn, Glisson & Mouton
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date		Firm Name
0:17-cv-00588-JNE-FLN	Laguna v. 3M Company et al	8/10/2017	8/31/2017	9/7/2017	The Law offices of Travis R. Walker, P.A
0:17-cv-00286-JNE-FLN	Charles v. 3M Company et al.	8/14/2017	9/4/2017	9/7/2017	The Law offices of Travis R. Walker, P.A
Case Number	Title	3rd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:15-cv-03736-JNE-FLN	Printup v. 3M Company et al	6/28/2017	7/19/2017	9/7/2017	Gustafson Gluek PLLC

CASE 0:15-md-02666-JNE-DTS Doc. 1021-1 Filed 12/07/17 Page 9 of 15

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response(As of October 13, 2017)

Case Number	Title	3rd Deficiency Sent	Prior Listing	Firm Name
0:15-cv-03951-JNE-	Hernandez v. 3M	4/11/2017	6/9/2017	The Law offices of Travis
FLN	Company et al		7/14/2017	R. Walker, P.A.
			8/11/2017	
			9/07/2017	
0:15-cv-04493-JNE-	Ciappa et al v. 3M	4/11/2017	6/9/2017	Parker Waichman
FLN	Company et al		7/14/2017	
			8/11/2017	
			9/07/2017	
0:16-cv-02054-JNE-	Trainer v. 3M	4/10/2017	6/9/2017	Pendley, Baudin & Coffin,
FLN	Company et al		07/14/2017	LLP
			08/11/2017	
			09/07/2017	
0:16-cv-02663-JNE-	McKevitt et al v. 3M	4/5/2017	6/9/2017	Brown & Crouppen, PC
FLN	Company Inc et al		07/14/2017	
			08/11/2017	
			09/07/2017	
0:16-cv-03279-JNE-	McGlothlin et al v. 3M	4/24/2017	6/9/2017	DeGaris & Rogers, LLC
<u>FLN</u>	Company et al		07/14/2017	· ·
			08/11/2017	
			09/07/2017	
0:16-cv-03329-JNE-	Gray v. 3M Company	4/20/2017	6/9/2017	Kirtland & Packard LLP
FLN	et al		07/14/2017	
0:16-cv-03618-JNE-	Messner-Katzer v. 3M	5/16/2017	6/9/2017	Capretz & Associates
FLN	Company et al		07/14/2017	
			08/11/2017	
			09/07/2017	
0:17-cv-01030-JNE-	Woolard v. 3M	10/2/2017		Law Offices of James S.
<u>FLN</u>	Company et al			Rogers
0:17-cv-01134-JNE-	Newman v. 3M	7/13/2017	7/14/2017	McGlynn, Glisson and
<u>FLN</u>	Company et al		8/11/2017	Mouton
			09/07/2017	

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

EXHIBIT C

From: Ben Hulse

Sent: Tuesday, November 14, 2017 4:12 PM

To: 'JoanEricksen_Chambers@mnd.uscourts.gov' < <u>JoanEricksen_Chambers@mnd.uscourts.gov</u>>;

'Noel Chambers@mnd.uscourts.gov' < Noel Chambers@mnd.uscourts.gov >

Cc: Jerry Blackwell < blackwell@blackwellburke.com >; Bridget Ahmann

<Bridget.Ahmann@FaegreBD.com</p>
; 'gzimmerman@meshbesher.com'

<gzimmerman@meshbesher.com>; 'bgordon@levinlaw.com' <bgordon@levinlaw.com>;

'MVC@ciresiconlin.com' < MVC@ciresiconlin.com >; 'JMC@CiresiConlin.com' < JMC@CiresiConlin.com >;

'David J. Szerlag' < david@pritzkerlaw.com >; 'Wendy Thayer' < wendy@pritzkerlaw.com >

Subject: Bair Hugger, MDL 2666 -- Defendants' lists of PFS disputes for November 2017

Dear Judge Ericksen,

Even though this month's status conference has been cancelled, Defendants would still like to list cases with Plaintiff Fact Sheet disputes, as provided by PTO 14, paragraph 7, Dkt. No. 117.

In October, the Court ordered that PFS disputes were deemed "addressed to the Court" notwithstanding the cancellation of the in-court conference. (Dkt. No. 959.) Defendants request the same for this month.

Best regards,
Ben Hulse
Counsel for Defendants

Benjamin W. Hulse Blackwell Burke P.A. 431 South Seventh Street, Suite 2500 Minneapolis, MN 55415 Direct (612) 343-3256 Fax (612) 343-3205

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CASE 0:15-md-02666-JNE-DTS Doc. 1021-1 Filed 12/07/17 Page 12 of 15

Defendants' PFS List 1: Overdue Plaintiff Fact Sheets (Created November 14, 2017)

Case Number	Title	Date Filed	Due Date	Comments	Prior Listing	Firm Name
<u>0:17-cv-01441-JNE-FLN</u>	Morgan v. 3M Company et al	5/1/2017	7/30/2017		8/10/2017 9/07/2017 10/13/2017	Bernstein Liebhard LLP
0:17-cv-03008-JNE-FLN	Toland v. 3M Company et al	7/17/2017	8/8/2017 8/14/2017; 9/13/2017	Defendants granted Plaintiff two extensions.	10/13/2017	PC
0:17-cv-02395-JNE-FLN	Hecht, Theodore v. 3M Company et al	6/29/2017	9/27/2017		10/13/2017	Kirtland & Packard LLP
0:17-cv-02394-JNE-FLN	Mucci v. 3M Company et al	6/29/2017	9/27/2017		10/13/2017	Kirtland & Packard LLP
0:17-cv-02685-JNE-FLN	Daniels et al v. 3M Company et al	7/10/2017	10/8/2017			Brown & Crouppen, PC
0:17-cv-02747-JNE-FLN	Graves v. 3M Company et al	7/11/2017	10/9/2017			The Olinde Firm, LLC
0:17-cv-02738-JNE-FLN	Allen v. 3M Company et al	7/11/2017	10/9/2017			The Olinde Firm, LLC
0:17-cv-02755-JNE-FLN	Morris v. 3M Company et al	7/11/2017	10/9/2017			Kennedy Hodges, LLP
0:17-cv-02881-JNE-FLN	Prince v. 3M Company et al	7/13/2017	10/11/2017			Bernstein Liebhard LLP
0:17-cv-02853-JNE-FLN	Wallis v. 3M Company et al	7/13/2017	10/11/2017			Bernstein Liebhard LLP
0:17-cv-02892-JNE-FLN	Saylor v. 3M Company et al	7/14/2017	10/12/2017			The Olinde Firm, LLC
0:17-cv-03037-JNE-FLN	Flowers v. 3M Company et al	7/18/2017	10/16/2017			Kennedy Hodges, LLP
0:17-cv-03038-JNE-FLN	Schapansky v. 3M Company et al	7/18/2017	10/16/2017			Kennedy Hodges, LLP
0:17-cv-03112-JNE-FLN	Depew v. 3M Company et al	7/19/2017	10/17/2017			Kirtland & Packard LLP
0:17-cv-03078-JNE-FLN	Torres v. 3M Company et al	7/19/2017	10/17/2017			Kennedy Hodges, LLP
0:17-cv-03556-JNE-FLN	Clausen et al v. 3M Company et al	8/4/2017	11/2/2017			Hare, Wynn, Newell & Newton

Yellow highlighting indicates that the case was previously listed per PTO 14 (Dkt. No. 270).

CASE 0:15-md-02666-JNE-DTS Doc. 1021-1 Filed 12/07/17 Page 13 of 15

Defendants' PFS List 2: Plaintiffs Who Have Not Responded to Defendants' Deficiency Notices (Created November 14, 2017)

Case Number	Title	1st Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-01706-JNE-FLN	Price et al v. 3M Company et al	9/18/2017	10/09/207		Walters Law Firm, LLC
0:17-cv-01879-JNE-FLN	Sellers v. 3M Company et al	9/28/2017	10/19/2017		Kennedy Hodges, LLP
0:17-cv-01493-JNE-FLN	Grussing v. 3M Company et al	10/11/2017	11/1/2017		Hendrickson Law
0:17-cv-01027-JNE-FLN	Warren v. 3M Company et al	10/12/2017	11/2/2017		Bernstein Liebhard LLP
0:17-cv-01494-JNE- FLN	Six v. 3M Company et al	10/12/2017			Hendrickson Law
0:17-cv-02099-JNE-FLN	Osborne v. 3M Company et al	10/12/2017			Kennedy Hodges, LLP
Case Number	Title	2nd Deficiency Notice Sent	Response Due Date		Firm Name
0:17-cv-00286-JNE-FLN	Charles v. 3M Company et al.	8/14/2017	9/4/2017	9/7/2017 10/13/2017	The Law offices of Travis R. Walker, PA
0:17-cv-01082-JNE-FLN	Petrakis v. 3M Company et al	9/18/2017	10/9/2017		Kennedy Hodges, L.L.P.
0:17-cv-01330-JNE-FLN	Yarbrough v. 3M Company	9/27/2017	10/18/207		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<u>Case Number</u>	Title	3rd Deficiency Notice Sent	Response Due Date	Prior Listing	Firm Name
0:17-cv-00288-JNE-FLN	Bradford v. 3M Company et al	9/29/2017	10/20/2017		The Law offices of Travis R. Walker, PA

CASE 0:15-md-02666-JNE-DTS Doc. 1021-1 Filed 12/07/17 Page 14 of 15

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response (Created November 14, 2017)

Case Number	Title	3rd Deficiency Sent	Prior Listing	Firm Name
0:15-cv-03951-JNE-FLN	Hernandez v. 3M	4/11/2017	6/9/2017	The Law offices of Travis R. Walker,
<u> </u>	Company et al	,, 22, 202,	07/14/2017 08/11/2017 09/07/2017 10/13/2017	PA
0:15-cv-04004-JNE-FLN	Peterson v. 3M Company	4/4/2017	4/14/2017; 6/09/2017 7/14/2017 10/13/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:16-cv-01153-JNE-FLN	Surgeon v. 3M Company	4/20/2017	6/9/2017 07/14/2017 10/13/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<u>0:16-cv-01155-JNE-FLN</u>	Sutter v. 3M Company	4/21/2017	6/9/2017 07/14/2017 10/13/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
<u>0:16-cv-02663-JNE-FLN</u>	McKevitt et al v. 3M Company Inc et al	4/4/2017	06/09/2017 07/14/2017 08/11/2017 09/07/2017 10/13/2017	Brown & Crouppen, PC
0:16-cv-03329-JNE-FLN	Gray v. 3M Company et al	5/4/2017	06/09/2017 07/14/2017 10/13/2017	Kirtland & Packard LLP
0:16-cv-03618-JNE-FLN	Messner-Katzer v. 3M Company et al	5/16/2017	06/09/2017 07/14/2017 08/11/2017 09/07/2017 10/13/2017	jcapretz@capretz.com
0:16-cv-04154-JNE-FLN	Pavlovic v. 3M Company	6/29/2017	6/9/2017 07/14/2017 10/13/2017	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:17-cv-01134-JNE-FLN	Newman v. 3M Company et al	7/13/2017	07/14/2017 08/11/2017 09/07/2017 10/13/2017	Brown & Crouppen, PC
0:16-cv-01364-JNE-FLN	Vernal v. 3M Company	4/18/2017		Langdon & Emison
0:16-cv-02298-JNE-FLN	Dandrea et al v. 3M Company et al	4/19/2017	1	Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA
0:16-cv-02428-JNE-FLN	King v. 3M Company et al	4/19/2017		Kennedy Hodges, LLP
0:16-cv-02957-JNE-FLN	Zivanovich v. 3M Company	4/24/2017		Levin, Papantonio, Thomas, Mitchell, Rafferty & Proctor, PA

CASE 0:15-md-02666-JNE-DTS Doc. 1021-1 Filed 12/07/17 Page 15 of 15

Defendants' PFS List 3: Core Deficiencies Remained Following Notice and Response (Created November 14, 2017)

0:16-cv-04038-JNE-FLN	Bell-Young v. 3M	6/20/2017		Kirtland & Packard LLP
	Company et al			
0:16-cv-04161-JNE-FLN	Bond v. 3M	6/30/2017		Levin, Papantonio, Thomas,
	Company			Mitchell, Rafferty & Proctor, PA
0:17-cv-00343-JNE-FLN	Grooms v. 3M	8/24/2017		Levin, Papantonio, Thomas,
	Company			Mitchell, Rafferty & Proctor, PA
0:17-cv-00570-JNE-FLN	Harrison v. 3M	9/1/2017	10/13/2017	Levin, Papantonio, Thomas,
	Company			Mitchell, Rafferty & Proctor, PA
0:17-cv-00640-JNE-FLN	Johnson v. 3M	10/3/2017		Brown & Crouppen, PC
	Company et al			
0:17-cv-00711-JNE-FLN	Garcia v. 3M	10/16/2017		Levin, Papantonio, Thomas,
	Company			Mitchell, Rafferty & Proctor, PA
0:17-cv-00998-JNE-FLN	Gruetzmacher v. 3M	10/16/2017		Levin, Papantonio, Thomas,
	Company			Mitchell, Rafferty & Proctor, PA
0:17-cv-01017-JNE-FLN	Guzman v. 3M	10/16/2017		Levin, Papantonio, Thomas,
	Company			Mitchell, Rafferty & Proctor, PA
0:17-cv-01389-JNE-FLN	Cooper et al v. 3M	10/11/2017		Brown & Crouppen, PC
	Company et al	, , , , , , , , , , , , , , , , , , , ,		
	Schriewer et al v.	10/12/2017		Brown & Crouppen, PC
0:17-cv-02194-JNE-FLN	3M Company et al			
0:17-cv-02212-JNE-FLN	Smith, Leonard	10/12/2017		Brown & Crouppen, PC
0.17 02254 INE FIN	Snider et al v. 3M	10/12/2017		Brown & Crouppen, PC
0:17-cv-02254-JNE-FLN	Company et al			
	Main on Tuellon at al	10/12/2017		Brown & Crouppen, PC
0:17-cv-02296-JNE-FLN	Weiner-Tuskes et al			
	v. 3M Company et al			
0.47 02200 INE ELN	Young v. 3M	10/12/2017		Brown & Crouppen, PC
0:17-cv-02300-JNE-FLN	Company et al		tar Turk Tara	
0.47 00004 INF FIN	Stokes v. 3M	10/12/2017		Brown & Crouppen, PC
0:17-cv-02301-JNE-FLN	Company et al			
0:17-cv-02305-JNE-FLN	Wooden et al v. 3M	10/12/2017		Brown & Crouppen, PC
	Company et al			
0.47 00000 1115 5:::	Smith et al v. 3M	10/12/2017		Brown & Crouppen, PC
0:17-cv-02309-JNE-FLN	Company et al			